

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

**Globe Metallurgical, Inc.
County Route 32
Waterford, Ohio 45768**

ATTENTION:

**Matthew Greene
Environmental, Health, and Safety Corporate Manager**

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Globe Metallurgical, Inc. ("Globe" or "you") to submit certain information about Globe's facility located at County Road 32, Waterford, Ohio ("the facility"). Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B contains requirements for conducting a ventilation study. You must send this information to us according to the schedule contained in each appendix.

We are issuing this information request under Section 114(a) of the Clean Air Act (CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Globe owns and operates emission sources at the Waterford, Ohio facility. We are requesting this information to determine whether your emission sources are complying with the CAA.

Globe must send all required information to:

Attn: Compliance Tracker, AE-18J
Air Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Boulevard
Chicago, Illinois 60604

Globe must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term "emissions data."

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.


We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Globe to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should directly any question about this information request to the EPA contacts in this matter: Virginia Galinsky, Environmental Engineer, Alexandra Letuchy, Environmental Engineer, and Terry Branigan, Associate Regional Counsel or to Jeffrey Spector at the Department of Justice at (312) 353-2089, (312) 886-6035, (312) 353-4737, and (202) 514-4432, respectively.

Date

2/15/17


Edward Nam
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions for electronic submissions and definitions.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.
3. Provide submission on physical media such as compact disk, flash drive or similar item.
4. Provide a table of contents for each disk or drive so that each document can be accurately identified in relation to your response to a specific question. We recommend the use of electronic file folders organized by question number. In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*

1. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided

in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.

2. The terms "relate to" or "pertain to" (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.

Appendix B

Ventilation Evaluation Requirements

Globe shall engage an independent third party with expertise in evaluating baghouse design and capture efficiency to conduct a third party ventilation and capture evaluation of No. 1 and No. 2 Shop emission units: F009 (No. 1 Hot Metal Casting), P023 (No. 1 Shop Plunging Station), and P902 – P908 (Furnace No. 1 - 3, 5, and 7) (“No. 1 and No. 2 Shop Evaluation”). The evaluation shall be conducted in accordance with the plan developed by Globe and its consultant(s), and approved in advance by EPA (“No. 1 and No. 2 Shop Evaluation Plan”). Globe shall provide a formal report at the conclusion of the evaluation (“No. 1 and No. 2 Shop Evaluation Report”).

Globe must submit the evaluation plan and report in accordance with the schedule specified below:

| | |
|---|--|
| Submit No. 1 and No. 2 Shop Evaluation Plan | Within 45 days of receipt of this request |
| Submit No. 1 and No. 2 Shop Evaluation Report | Within 105 days of receipt of this request |

The No. 1 and No. 2 Shop Evaluation shall assess the current ventilation capture systems (hoods, ducts, fans, baghouse) and capture efficiency using computational fluid dynamics (CFD) modeling and provide recommendations for achieving 100% capture efficiency¹.

The No. 1 and No. 2 Shop Evaluation Plan must include all elements necessary to perform a comprehensive ventilation and capture evaluation and must specifically include (but not necessarily be limited to) the following:

- (i) Name and relevant experience of consultant(s)
- (ii) Items related to Operation:
 - a. Specification that each capture efficiency evaluation for each furnace will be conducted over the entire process operating cycle (i.e., feeding, smelting, and tapping operations);
 - b. Identification of the highest production level achievable with feed materials representative of the type of materials processed by the emission unit that yield the highest rate of particulate matter (PM) emissions (i.e., largest PM emission generating scenario);
 - c. Identification of the range of process or operating rates for the furnaces, casting operation, and plunging operation;
 - d. Specification that the capture efficiency evaluation will assess capture during the highest production level achievable; and
 - e. Description of how air pollution control and process equipment will be monitored.
- (iii) Methods for analyzing current capture and improvements:

¹ As demonstrated by no particulate matter emissions escaping from each emission unit capture systems (at the points of capture) that are visible without the aid of an instrument. If elimination of visible particulate matter emissions is not possible with good engineering design at the tapping station, plunging station, and casting operation, evaluation should include recommendations for achieving the highest capture efficiency possible.

- a. Detailed description of the method(s) to be used to analyze current capture of PM and improvements to capture of PM from the furnaces, casting operation, and plunging operation. The methods should include, but not be limited to:
 - i. Using CFD analysis;
 - ii. Determining air flows, static pressure, velocity, temperature, fan performance, and any other relevant data measurements at the furnace emission capture point(s), tapping emission capture point(s), and plunging station capture point(s); and
 - iii. Using video plume photography.

The No. 1 and No. 2 Shop Evaluation Report must include the following information:

- (i) Design capacity (i.e., flow rate) of the current exhaust gas capture and collection system, including the design flow rates at the furnace emission capture point(s), tapping emission capture point(s), plunging station capture point(s);
- (ii) Expected fume generation flow rate during feeding, smelting, tapping, casting, and plunging;
- (iii) Actual flow rates that are associated with the exhaust gases during furnace operations, casting operations, and plunging operations, as measured at the furnace emission capture point(s), tapping emission capture point(s), plunging station capture point(s);
- (iv) Capture efficiency during feeding, smelting, and tapping; casting; and plunging;
- (v) A plot of predicted capture efficiency vs airflow at the furnace emission capture point(s), tapping emission capture point(s); and plunging capture point(s);
- (vi) Brief description of sampling and analytical methods;
- (vii) Description of any deviations from the No. 1 and No. 2 Shop Evaluation Plan;
- (viii) Recommendations for physical and/or operational changes (e.g. modifications, enhancements, upgrades, expansions, and additions to the existing system) that result in 100% capture, including evaluation of improvement options (as appropriate), CFD analysis, capital cost estimates, and estimated timelines for implementation;
- (ix) Potential locations for a permanent installation of an airflow monitor at the furnace emission capture point(s) and tapping emission capture point(s); and
- (x) Copies of any and all raw field data, including the following:
 - a. Complete results, with example calculations (as appropriate);
 - b. Photos and videos;
 - c. Air flow measurements at fixed openings, wall louvers, and doors (as appropriate);
 - d. Air flow velocity, pressure, and temperature readings inside the shop, in the ducts, at the dust collector units, and at hoods;
 - e. Heat sheets and operating sheets;
 - f. CFD modeling inputs and outputs;
 - g. Additional modeling inputs, outputs, and results;
 - h. Operating data (fan performance, baghouse operating data, etc);
 - i. Sampling port locations and dimensioned cross sections (as appropriate); and
 - j. Calibration procedures and results.

Appendix C

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2.

“Emission data” means, with reference to any source of emissions of any substance into the air:

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by the source), or any combination of the foregoing;

Information necessary to determine the identity, amount, frequency, concentration or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including to the extent necessary for such purposes, a description of the manner and rate of operation of the source); and

A general description of the location and/or nature of the source to the extent necessary to identify the source and to distinguish it from other sources (including, to the extent necessary for such purposes, a description of the device, installation, or operation constituting the source).

40 C.F.R. § 2.301(a)(2)(i)(A),(B) and (C).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential. Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth at Section 114(c) of the CAA and 40 C.F.R Part 2. *Allegedly confidential portions of otherwise non-confidential documents* should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the Request to Provide Information as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information is Entitled to Confidential Treatment

All confidentiality claims are subject to EPA verification and must be made in accordance with 40 C.F.R. § 2.208, which provides in part that you must satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so; that the information is not and has not been reasonably obtainable by legitimate means without your consent and that disclosure of the information is likely to cause substantial harm to your business's competitive position.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential **by page, paragraph, and sentence**. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, please specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, **explain with specificity** why release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, **you bear the burden of substantiating your confidentiality claim.** Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

CERTIFICATE OF MAILING

I, Tena Robinson, certify that I sent a Request to Provide

Information Pursuant to the Clean Air Act by Certified Mail, Return Receipt Requested, to:

Matthew Greene
Environmental, Health, and Safety Corporate
Manager
Globe Metallurgical, Inc.
County Route 32
Waterford, Ohio 45768

I also certify that I sent a copy of the Request to Provide Information Pursuant to the
Clean Air Act by E-mail to:

Bob Hodanbosi, Chief
Division of Air Pollution Control
bob.hodanbosi@epa.ohio.gov

Melissa Witherspoon
Southeast District Office
melisa.witherspoon@epa.ohio.gov

On the 16th day of February 2017.

Tena Robinson
for Kathy Jones, Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7660 7056